

U.S. Department of Justice

Washington, DC 20530

Exhibit A to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name and Address of Registrant John E. Sweeney, Esq. [Address on file with the Department of Justice FARA Unit]		2. Registration No. 6713						
3. Name of Foreign Principal Vnesheconombank, State Development Corporation ("VEB.RF") through International Centre for Legal Protection ("ICLP")	4. Principal Address of Foreign Principal International Centre for Legal Protection 12 Krasnopresenskaya Nab. 123610, Moscow, Russian Federation							
5. Indicate whether your foreign principal is one of the following:								
<input type="checkbox"/> Government of a foreign country ¹ <input type="checkbox"/> Foreign political party <input checked="" type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <table border="0"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Committee</td> </tr> <tr> <td><input type="checkbox"/> Corporation</td> <td><input type="checkbox"/> Voluntary group</td> </tr> <tr> <td><input type="checkbox"/> Association</td> <td><input checked="" type="checkbox"/> Other (<i>specify</i>) <u>State-owned investment bank</u></td> </tr> </table> <input type="checkbox"/> Individual-State nationality _____			<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee	<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group	<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) <u>State-owned investment bank</u>
<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee							
<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group							
<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) <u>State-owned investment bank</u>							
6. If the foreign principal is a foreign government, state:								
a) Branch or agency represented by the registrant N/A								
b) Name and title of official with whom registrant deals N/A								
7. If the foreign principal is a foreign political party, state:								
a) Principal address N/A								
b) Name and title of official with whom registrant deals N/A								
c) Principal aim N/A								

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

8. If the foreign principal is not a foreign government or a foreign political party:

a) State the nature of the business or activity of this foreign principal.

VEB.RF supports and develops the Russian economy. In partnership with commercial banks, it provides financing for large-scale projects to develop the country's infrastructure, industrial production and social sphere, strengthen its technological potential and improve the quality of life.

b) Is this foreign principal:

Supervised by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Owned by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Directed by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Controlled by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Financed by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Subsidized in part by a foreign government, foreign political party, or other foreign principal	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

9. Explain fully all items answered "Yes" in Item 8(b). *(If additional space is needed, a full insert page must be used.)*

VEB.RF is a state-owned investment bank.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit A to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit A	Name and Title	Signature
August 30, 2019	John E. Sweeney, Esq.	Signed electronically by John E. Sweeney

U.S. Department of Justice

Washington, DC 20530

Exhibit B to Registration Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .33 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

John E. Sweeney, Esq.

2. Registration No.

6713

3. Name of Foreign Principal

Vnesheconombank, State Development Corporation
("VEB.RF") through the International Centre for Legal Protection ("ICLP")

Check Appropriate Box:

4. ☒ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. Describe fully the nature and method of performance of the above indicated agreement or understanding.

As detailed in the attached contract between the Registrant and ICLF, the Registrant will perform political activities for a fixed monthly fee.

8. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The Registrant proposes to engage in meetings and other communications with U.S. government officials regarding potential new sanctions legislation (not U.S. sanctions in place on August 1, 2019) that could affect the activities of VEB.RF.

9. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act and in the footnote below? Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

The Registrant proposes to engage in meetings and other communications with U.S. government officials regarding potential new sanctions legislation (not U.S. sanctions in place on August 1, 2019) that could affect the activities of VEB.RF.

EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this Exhibit B to the registration statement and that he/she is familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date of Exhibit B August 30, 2019	Name and Title John E. Sweeney, Esq.	Signature Electronically signed by John E. Sweeney
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Footnote: "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

JOHN E. SWEENEY

ATTORNEY AT LAW



August 01, 2019

Mr. Andrey Kondakov
Director General
International Centre for Legal Protection
12 Krasnopresnenskaya Nab.
123610, Moscow, Russian Federation

Dear Mr. Kondakov,

This letter sets forth the terms under which International Centre for Legal Protection (“*ICLP*”), as an agent for Vnesheconombank, State Development Corporation, hereinafter “*VEB.RF*,” is engaging John E. Sweeney, Attorney at Law, related to the representation of *VEB.RF*’s interests in connection with the provision of legal services that may include potential meetings with U.S. government officials regarding potential new sanctions legislation (*not* existing sanctions) that could affect the activities of *VEB.RF*. The specific deliverables and project schedule shall be set forth in a project workplan.

I will be primarily responsible for the work done, subject to any and all applicable regulatory filing, licensing and registration requirements. I anticipate that associates, staff attorneys, legal assistants, and in-house consultants will assist in this matter.

Legal fees and disbursements for the services shall be at the flat rate of USD 62,500 per month, for a period of 12 months starting from August 1, 2019 and concluding July 31, 2020. Detailed reports of services rendered will be submitted to *ICLP* every three months no later than the fifteenth day following the end of the quarter, by electronic copy. At least fifteen days after the submission of each quarterly detailed report of services rendered, I will submit a quarterly invoice to *ICLP*, covering legal services rendered and disbursements incurred during the preceding quarter. The quarterly invoice shall be settled by *ICLP* within **14 (fourteen) days** of the date of the quarterly invoice. I will issue a final year-end invoice not later than December 10, covering legal services rendered and disbursements incurred through November 30 of each year. The final year-end invoice shall be settled by *ICLP* within **14 (fourteen) days** of the date of the final invoice. Given that *VEB.RF* is a new client and that this matter will require an early commitment of significant resources, I require an advanced payment of USD \$62,500, for which I will issue a separate invoice that shall be settled within **14 (fourteen) days** of the date of that separate invoice.

Payments shall be made to my account:

Wiring Instructions

Account
Account
ABA / Ro
Swift/BIC

I confirm that *ICLP* shall have the right:

- to give instructions to me regarding its preferences for the representation of its interests and the protection of its rights;
- to demand and receive necessary explanations and information;
- to unilaterally terminate my engagement for any reason by submitting written notice to me.

If *ICLP* elects to terminate the engagement, *ICLP* shall take all steps necessary to free me of any obligations to perform further, and *ICLP* shall pay all unpaid fees accumulated up until the end of month at which the termination of the engagement shall take place, without an obligation to pay any further monthly fees.

Please confirm your acceptance of this Engagement Agreement by countersigning the enclosed copy of this Agreement and returning it to me via email. Throughout our relationship, I want *ICLP* and *VEB.RF* to be satisfied with the professional services that I perform on *VEB.RF's* behalf. Accordingly, I encourage you to contact me just as soon as you have any questions or concerns regarding my services or my fees.

I look forward to working with you.

Yours sincerely,

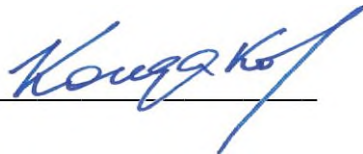


John Sweeney, Esq., U.S. Congressman (Ret.)

READ AND AGREED TO:

Andrey Kondakov
International Centre for Legal Protection

Signature: _____



Date: August 2, 2019